



20 September 2016

To Whom It May Concern,

The United States Environmental Protection Agency's (EPA's) Proposed Cleanup Plan for the Portland Harbor Superfund Site recently proposed the EPA's preferred *Alternative 1* for remediation of the lower Willamette River and its river banks. We, the St. Johns Neighborhood Association board, strongly oppose *Alternative 1* as a viable option to remediate the Portland Harbor Superfund Site for the following reasons:

1. The Proposed *Alternative 1* does not meet the criteria for protectiveness of human and ecological health. There needs to be an end goal requirement that when the cleanup is completed, the resident fish in this stretch of the river will be safe for people to eat. Additionally, the proposed alternative does not include a monitoring program to address the short and long term effects on the fish and aquatic ecosystem.
2. The Proposed *Alternative 1* does not meet the criteria for long term effectiveness. Burying contaminants in the river bottom has short term benefits, but it leaves open the risk that any major event, earthquake, flood, or even a ship turning the wrong way, will disturb the cover material and release the contaminants back into the river system.
3. The Proposed *Alternative 1* leaves a substantial amount of contaminants in the river, including PCBs, dioxins/furans, DDTs, and metals that will not degrade and will continue to have adverse effects on the River and its ecosystem.
4. The Proposed *Alternative 1* plans to use confined disposal facilities (CDF) on the River to contain parts of the contaminated dredge material. The community is adamantly opposed to having a CDF for any part of the contamination.

We are encouraging EPA to adopt **Alternative G+** with some modifications in order to ensure an effective cleanup. Only **Alternative G+** will ensure that people can safely consume the native fish that swim in the River. Only **Alternative G+** will permanently remove contaminants from the River. Additionally we encourage EPA to adopt **Alternative G+** and address the following concerns that have not been adequately addressed in the feasibility study and the proposed options:

- Atmospheric release of polychlorinated biphenyls (PCBs) is not included in the EPA analysis or Proposed Plan. Inhalation of PCBs during the remediation process can cause harmful health effects in people. The proposed plan should address and include air monitoring during and after the removal and remedial actions.
- There has not been a full buy-in from the community, including the Community Advisory Group (CAG), the City and the State. CAG has dedicated years and extensive time to this issue and their opinions should be taken into consideration and heard during this process. To date, this has not been the case. Additionally, consultation and coordination with the tribal communities have been nominal and they are greatly affected by the outcome of this plan.

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- The Feasibility Study has not adequately included newer technologies, including dredging technologies that have been successful at other sites and could be much less invasive on the river and the river banks.
- Potentially existing upland and upriver sources have not been addressed, thus resulting in the potential for additional contamination to river.
- The proposed alternatives do not include a long enough time frame for the cleanup and continual monitoring in perpetuity. Additionally, the economic benefits of a clean river, fishing, boating, and additional maritime activities should be included in the economic analysis.
- ALL standards, including the drinking water and surface water standards should be met after the cleanup is complete.
- The proposed plan should specifically address the restoration of any lost habitat and the actions that will be completed following removal and remedial actions.
- The proposed plan should include a percentage requirement to hire from local firms and contractors for the removal and remedial actions.

We strongly encourage EPA to address the above issues before choosing an alternative. We strongly encourage EPA to adopt **Alternative G+** with some modifications in order to ensure an effective cleanup.

Thank you for your consideration,

St. Johns Neighborhood Association 2016 Board